



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

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OFFICE OF  
ECOSYSTEMS, TRIBAL  
AND PUBLIC AFFAIRS

June 23, 2014

James W. Balsinger, Ph.D.  
Administrator, Alaska Region  
National Oceanic and Atmospheric Administration  
P.O. Box 21668  
Juneau, Alaska 99802-1668

RE: EPA comments on the Management of the Subsistence Harvest of Northern Fur Seals on St. George Island Draft Supplemental Environmental Impact Statement, EPA Project # 03-048-NOA.

Dear Dr. Balsinger:

We have reviewed the above-mentioned Draft Supplemental Environmental Impact Statement (DSEIS) in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our NEPA Review policy and procedures, we rate DSEIS documents by considering both the adequacy of the document, and the potential environmental impacts of the action.

Overall we support the National Oceanic and Atmospheric Administration's (NOAA) efforts to improve flexibility, incorporate Alaska Native scientific knowledge, and increase conservation and sustainability measures associated with the northern fur seal harvest by Alaska Native residents on St. George Island. We also appreciate that although this is a supplemental document, you provided an executive summary for the reader. We believe the range of alternatives is reasonable and support the NOAA's preferred alternative (Alternative 2 modified management to reflect St. George petition and implement new conservation measures) as it results in fewer impacts to subsistence activities and supports co-management objectives, although Alternative 3 appears to be the environmentally preferable alternative based on lethal effects to the population in comparison to other alternatives.

Based on our review we have assigned a rating of "LO" (Lack of Objection) to the DSEIS. We urge timely action on this matter as the tribal government submitted its petition nearly seven years ago and this action will further strengthen the co-management relationship between the tribe and NOAA.

We appreciate the opportunity to review this DSEIS. If you have questions concerning our comments, please contact me at (206) 553-1601 or [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov).

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott", is positioned above the typed name.

Christine B. Reichgott, Manager  
Environmental Review and Sediments Management Unit

Enclosure

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.